

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

RAVIN GREENBERG, LLC

Chad B. Friedman
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Proposed Counsel for the Debtor/Debtor-In-Possession

In Re:

ELIZABETH AVENUE REALTY, LLC
Debtor.

Chapter 11

Case No. 18-23330-JKS

Judge: John K. Sherwood, U.S.B.J.

Hearing Date: August 14, 2018 at 10:00 a.m.

**NOTICE OF MOTION FOR ENTRY OF AN ORDER (I) APPROVING PROCEDURES
RELATED TO THE DEBTOR'S SALE OF PROPERTY LOCATED AT 813-815
ELIZABETH AVENUE, ELIZABETH, NEW JERSEY AND ASSUMPTION AND
ASSIGNMENT OF CERTAIN RELATED EXECUTORY CONTRACTS AND
UNEXPIRED LEASES PURSUANT TO 11 U.S.C. §§ 363 AND 365 AND FED. R.
BANKR. P. 6004, 6006 AND 9014; (II) SCHEDULING (A) AN AUCTION WITH
RESPECT TO THE PROPERTY AND (B) A HEARING DATE TO CONFIRM SALE;
(III) APPROVING THE FORM, MANNER AND SUFFICIENCY OF NOTICE; (IV)
AUTHORIZING THE DEBTOR'S SALE OF THE PROPERTY TO SUCCESSFUL
BIDDER; AND (V) GRANTING RELATED RELIEF**

PLEASE TAKE NOTICE that Elizabeth Avenue Realty, LLC (the "Movant"), by and through its proposed counsel, hereby moves for entry of the above described Order (the "Motion").

PLEASE TAKE FURTHER NOTICE that a hearing on the Motion (the "Hearing") will be held on **August 14, 2018, at 10:00 A.M.** (the "Hearing Date") before the Honorable John K. Sherwood, United States Bankruptcy Court, 50 Walnut Street, Newark, NJ 07102.

PLEASE TAKE FURTHER NOTICE that in support of this Motion, the Movant will rely on the accompanying Application and Exhibits thereto. Proposed Orders are also enclosed therewith.

PLEASE TAKE FURTHER NOTICE that if you do not want the Court to grant the Motion, or if you want the court to consider your views on the Motion, then you or your attorney must file with the court a written response explaining your position (the “Response”), on or before (7) seven days before the Hearing Date (the “Objection Deadline”) at: The United States Bankruptcy Court, Clerk’s Office, 50 Walnut St., Newark, NJ 07102. If you mail your Response to the court for filing, you must mail it early enough so the court will **receive** it on or before the Objection Deadline.

PLEASE TAKE FURTHER NOTICE that you **MUST** also serve a copy of any Response upon counsel for the Movant so as to be received by the Objection Deadline, at: Ravin Greenberg, LLC, 24 Commerce Street, Suite 420, Newark New Jersey 07102.

PLEASE TAKE FURTHER NOTICE that if you file a Response to the Motion, you should be prepared to argue that Response at the Hearing unless an agreement with the Movant to resolve Motion is reached or there is an agreement to continue the matter to a future hearing date.

PLEASE TAKE FURTHER NOTICE that your failure to file a timely Response to the Motion shall be deemed (i) a waiver of your right to respond to the Motion, and (ii) consent to the relief requested in the Motion. Further, the Motion will be deemed uncontested and the relief requested may be granted without a hearing.

PLEASE TAKE FURTHER NOTICE that appearances shall be waived unless opposing papers are filed.

PLEASE TAKE FURTHER NOTICE that no brief is being filed in support of the Motion, as the Motion is not believed to involve any contested issues of law.

Respectfully Submitted,

Dated: July 17, 2018

By: /s/Chad B. Friedman

Chad B. Friedman

RAVIN GREENBERG, LLC

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